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18
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19
 20 IN RE: UBER TECHNOLOGIES, INC.,
 21 PASSENGER SEXUAL ASSAULT
 22 LITIGATION

23 MDL No. 3084 CRB

24
DECLARATION OF RACHEL B.
ABRAMS IN SUPPORT OF REPLY OF
MOTION TO WITHDRAW AS COUNSEL
FOR PLAINTIFF JESSI WATT.

25 This Document Relates to:

26
 27 *Jessi Watt v. Uber Technologies, Inc., et al;*
 28 *3:25-cv-04704-CRB*

29 I, Rachel B. Abrams, declare:

- 30
 31 1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am
 32 admitted to practice before this Court. I make this declaration based on my own personal
 33 knowledge. If called upon to testify, I could and would testify competently to the truth
 34 of the matters stated herein.
- 35
 36 2. Circumstances outside counsel's control—including the inability to reach Plaintiff Jessi
 37 Watt and maintain consistent communication—have made continued representation
 38 impractical and unreasonably difficult.
- 39
 40 3. The communication breakdown between attorney and client underscores the

- 1 impossibility of effective representation under current conditions.
- 2 4. A breakdown in communication and trust between attorney and client constitutes good
3 cause for withdrawal, particularly where withdrawal will not prejudice other parties or
4 delay proceedings.
- 5 5. Plaintiff Jessi Watt's failure to communicate with and provide necessary information to
6 our firm has presented a circumstance covered by Rule 1.16(b)(4) of the California
7 Rules of Professional Conduct. We are unable to meet discovery deadlines and
8 otherwise prosecute her case without her input. Our withdrawal from the case has
9 become necessary.
- 10 6. Under the California Rules of Professional Conduct 1.16(d), my firm has taken all
11 reasonably available steps to avoid prejudice to the rights of Plaintiff Jessi Watt.
- 12 7. Our withdrawal from this case will not impact the timing or schedule of this litigation,
13 and we have taken all reasonable steps possible to avoid prejudice to Plaintiff by
14 informing her of her options and the consequences of failing to comply with case
15 deadlines.
- 16 8. I understand that pursuant to Local Rule 11-5(b), leave to withdraw may be conditioned
17 on our firm continuing to accept papers to forward to the client. We are able to accept
18 this responsibility.

19 Executed this day of December 23, 2025 in San Francisco, California.

20 */s/ Rachel B. Abrams*
21 Rachel B. Abrams

22 *Counsel for Plaintiff*

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